

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

H.B.,	:	
	:	
Plaintiff,	:	
	:	CIVIL ACTION FILE NO.
v.	:	1:22-cv-01181-JPB
	:	
RED ROOF INNS, INC. et al.,	:	
	:	
Defendants.	:	

**PLAINTIFF’S MOTION TO FILE UNDER SEAL**

Plaintiff moves to seal Attachments F-1 and F-2 of the Parties’ Proposed Consolidated Pretrial Order, which contains identifying information regarding Plaintiff’s family member’s full names and addresses. As such, the Protective Orders in this case [Dkt. Nos. 8, 76 and 75-1] requires Plaintiff to seek leave to file such documents under seal.

Thus, Plaintiff requests leave to file under seal Attachments F-1 and F-2 of the Parties’ Proposed Consolidated Pretrial Order pursuant to the Protective Orders.

Respectfully submitted this 2nd day of August, 2024.

**ANDERSEN, TATE & CARR, P.C.**

/s/ Jonathan S. Tonge  
Patrick J. McDonough  
Georgia Bar No. 489855  
pmcdonough@atclawfirm.com

Jonathan S. Tonge  
Georgia Bar No. 303999  
jtonge@atclawfirm.com  
Rory A. Weeks  
Georgia Bar No. 113491  
rweeks@atclawfirm.com  
Jennifer M. Webster  
Georgia Bar No. 760381  
jwebster@atclawfirm.com  
*Attorneys for Plaintiff*

One Sugarloaf Centre  
1960 Satellite Boulevard, Suite 4000  
Duluth, Georgia 30097  
(770) 822-0900 | Telephone  
(770) 822-9680 | Facsimile

**CERTIFICATE OF COMPLIANCE**

This is to certify that the foregoing has been prepared with one of the following font and point selections approved by the Court in LR 5.1., NDGA. Specifically, the above-mentioned was prepared using the Times New Roman font of 14 point size.

Respectfully submitted this 2nd day of August, 2024.

**ANDERSEN, TATE & CARR, P.C.**

/s/ Jonathan S. Tonge  
Patrick J. McDonough  
Georgia Bar No. 489855  
pmcdonough@atclawfirm.com  
Jonathan S. Tonge  
Georgia Bar No. 303999  
jtonge@atclawfirm.com  
Rory A. Weeks  
Georgia Bar No. 113491  
rweeks@atclawfirm.com  
Jennifer M. Webster  
Georgia Bar No. 760381  
jwebster@atclawfirm.com  
*Attorneys for Plaintiff*

One Sugarloaf Centre  
1960 Satellite Boulevard, Suite 4000  
Duluth, Georgia 30097  
(770) 822-0900 | Telephone  
(770) 822-9680 | Facsimile

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served a true and correct copy of the foregoing with the Clerk of Court using the CM/ECF system, which will send an email notification to all counsel of record.

Respectfully submitted this 2nd day of August, 2024.

**ANDERSEN, TATE & CARR, P.C.**

/s/ Jonathan S. Tonge  
Patrick J. McDonough  
Georgia Bar No. 489855  
pmcdonough@atclawfirm.com  
Jonathan S. Tonge  
Georgia Bar No. 303999  
jtonge@atclawfirm.com  
Rory A. Weeks  
Georgia Bar No. 113491  
rweeks@atclawfirm.com  
Jennifer M. Webster  
Georgia Bar No. 760381  
jwebster@atclawfirm.com  
*Attorneys for Plaintiff*

One Sugarloaf Centre  
1960 Satellite Boulevard, Suite 4000  
Duluth, Georgia 30097  
(770) 822-0900 | Telephone  
(770) 822-9680 | Facsimile